

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Anne Graham Bouchillon, as Personal)	
Representative of the Estate of Jordane)	C/A No.:
Michell Bouchillon,)	
)	
Plaintiff,)	
)	NOTICE OF REMOVAL
v.)	
)	
Michael Carson and Isothermal Textile)	
Services, LLC,)	
)	
Defendants.)	

TO: THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF SOUTH CAROLINA, SPARTANBURG DIVISION:

The Petitioners, Defendants Michael Carson and Isothermal Textile Services, LLC, by and
through their undersigned counsel, respectfully show this Court that:

1. Petitioners, Michael Carson and Isothermal Textile Services, LLC, are the
Defendants in the above-entitled action. Petitioner Michael Carson is an individual and Petitioner
Isothermal Textile Services, LLC is an entity, and at all times relevant to the Plaintiff's Complaint,
were citizens and residents of, and domiciled in, the State of North Carolina.

2. Anne Graham Bouchillon, Personal Representative of the Estate of Jordane Michell
Bouchillon, is the Plaintiff in the case, and, upon information and belief, is or may be a citizen and
resident of the State of South Carolina, as alleged in Plaintiff's Complaint. Therefore, all of the
parties to this action are diverse.

3. On or about February 12, 2021, the above-entitled action was filed in the
Spartanburg County Court of Common Pleas as case number 2021-CP-42-00486.

4. Upon information and belief, on or about February 27, 2021, Petitioner Michael Carson was served with the Summons and Complaint in this action. Additionally, on March 17, 2021, the undersigned counsel for Petitioners/Defendants accepted service of the Summons and Complaint on behalf of Petitioner Isothermal Textile Services, LLC. Upon information and belief, the Complaint was the first and only pleading in this matter served upon Petitioners. No Answer(s) has/have yet been filed in the case. The above-entitled action is a personal injury action involving an automobile collision between Plaintiff's decedent and Petitioner/Defendant Michael Carson on or about October 4, 2018, in Spartanburg County, South Carolina. Plaintiff has brought this wrongful death and survival action against Petitioners/Defendants and alleges negligence, among other things, against Petitioner/Defendant Michael Carson, and also alleges negligence, negligent hiring, and negligent supervision against Petitioner/Defendant Isothermal Textile Services, LLC.

5. In the Complaint, the Plaintiff's prayer for relief was left open. However, the undersigned counsel for Petitioners/Defendants has conferred with Plaintiff's counsel and understands that Plaintiff will not stipulate to damages of less than \$75,000.

6. The parties to this action are diverse and a verdict in the case may be in excess of \$75,000. Therefore, this Court has jurisdiction pursuant to 28 U.S.C. § 1332, and this case is eligible for removal pursuant to 28 U.S.C. § 1441. This Notice of Removal is timely because it is filed within 30 days of service on Petitioners.

7. Copies of all state court pleadings served on Petitioners and filed with the Spartanburg County Clerk of Court to date are attached as Exhibit A. The Clerk of Court for Spartanburg County, South Carolina, is being provided with a copy of this Notice of Removal contemporaneously with this filing via South Carolina's e-filing system, and

Petitioners/Defendants are serving a copy of this Notice on counsel for the Plaintiff contemporaneously with this filing.

WHEREFORE, Petitioners request that the above-entitled action be removed from the Spartanburg County Court of Common Pleas to this Court.

Respectfully submitted,

s/Brandon P. Jones

Brandon P. Jones, FED ID #10884

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Attorney for Petitioners/Defendants

Columbia, South Carolina
March 25, 2021